

FILED IN OPEN COURT  
U.S.D.C. - Atlanta

JUN 24 2020

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JAMES N. HATTEN, Clerk  
By:   
Deputy Clerk

UNITED STATES OF AMERICA

v.

CHRISTOPHER DOBBINS

Criminal Information

No. 1:20-CR-223

The United States Attorney charges that:

**18 U.S.C. § 1030(a)(5)(B)  
(Reckless Damage to a Protected Computer)**

1. On or about March 29, 2020, in the Northern District of Georgia, the defendant, CHRISTOPHER DOBBINS, intentionally accessed a protected computer without authorization, namely, a computer used to operate the NetSuite account for Company A, and as a result of such conduct, recklessly caused damage, and the offense caused loss, aggregating at least \$5,000 in value, to Company A during the one year period beginning on or about March 29, 2020, from DOBBINS's course of conduct affecting a protected computer, in violation of Title 18, United States Code, Section 1030(a)(5)(B) and (c)(4)(A)(i).

**Forfeiture**

2. Upon conviction of the offense alleged in this Information, the defendant, CHRISTOPHER DOBBINS, shall forfeit to the United States,

pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i), the defendant's interest in any and all personal property that was used or intended to be used to commit or to facilitate the commission of such violations, as well as any and all property constituting, or derived from, proceeds obtained directly or indirectly as a result of said violations. Such property includes, but is not limited to, a money judgment for a sum of money in United States currency equal to the amount of proceeds the defendant obtained as a result of the offenses for which the defendant is convicted.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above; all pursuant to

Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A) & (B),  
and Title 28, United States Code, Section 2461(c).

BYUNG J. PAK  
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